

EXHIBIT A



George Moore & Associates, Inc.

1-800-220-3281

TRUDY R. KOSLOW, M.Ed., CRC, CCM, CLCP, (D) ABVE

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Curriculum Vitae

Education:

Certificate Advanced Life Care Planning for Catastrophic Case Management, University of Florida, Orlando, FL, 1994-1995.

Thirty credits earned towards a Ph.D. in Rehabilitation Counseling, University of Maryland, College Park, MD, 1985-1988.

Master's Degree, Rehabilitation Counseling, Springfield College, Springfield, MA, 1980.

Certificate of Advance Graduate Study, Springfield College, Springfield, MA 1980.

B.A., Hispanic Studies, Smith College, Northampton, MA, 1977.

Certifications:

Certification in Rehabilitation Counseling, 1981

Certified in Case Manager, Commission on Case Manager Certification, 1993

Certification in Life Care Planning, Commission on Healthcare Certification, 1996

Diplomat, American Board of Vocational Experts, 1999

Certified Rehabilitation Provider, Commonwealth of Virginia, Department of Health Professionals, 1995

Certified Rehabilitation Provider, State of Maryland, 1999

Certified, Office of Worker's Compensation Programs, US Department of Labor, 1985

Capabilities:

Bi-lingual: English and Spanish

Expert Witness Testimony

Life Care Planning

Brian Injury Rehabilitation

Comprehensive Case Management

Medicare Set-Aside Development

- Conduct vocational evaluations and assessments to determine potential for placement.
- Counsel individuals with problems to include drug and alcohol, relationships, forming career goals, and determining educational needs and training.
- Provide vocational testing to include interest, personality, achievement and aptitude.

Professional Experience:

Rehabilitation Consultant/Expert Provider

George Moore & Associates, Inc.

August 1999 - Present

Provide expert services as requested including expert testimony and life care planning. Provide vocational evaluations and case management support for veterans with service related disabilities.

Vocational Rehabilitation Counselor, Consultant, and Life Care Planner

Trudy R. Koslow, M.Ed., CRC, CCM, CLCP

October 1984 - Present

Provide vocational rehabilitation counseling to English and Spanish speaking individuals. Provide counseling services in liability, long term disability and workers' compensation cases. Provide services to various insurance companies, attorneys, and the federal government. Provide regular consulting services to INOVA Mt. Vernon Rehabilitation Center and the Bridge Program, an outpatient brain injury treatment program. Develop life care plans and provide expert testimony. Have provided expert testimony in a variety of cases including medical malpractice, divorce, personal injury, employment law, motor vehicle accident and workers' compensation. Develop Medicare Set-Aside proposals.

Director of Rehabilitation Services

Capital Case Management - Partner

January 1996-March 1997

Provided supervision to a staff of ten counselors and coordinated case management services for the entire staff. Marketed counseling services to attorneys, insurance companies, federal and county governments, educational institutions and to individuals.

Instructor

University of Maryland

1985-May 1986

Taught Introduction to Rehabilitation Counseling course to undergraduate students. Developed curriculum, determined grading procedure and assisted students as needed.

Rehabilitation Counselor

Massachusetts Rehabilitation Commission

August 1980-August 1984

Provided vocational rehabilitation counseling to persons with various disabilities. Managed a caseload of approximately 100 English and Spanish speaking individuals. Voluntary supervision of graduate and undergraduate students doing practicums and internships.

Counselor/Coordinator

Alcoholism Services of Greater Springfield – DWI Program, Springfield, MA
April 1980-August 1980

Provided one on one counseling of individuals arrested for driving while intoxicated focusing on individuals who exhibited problematic involvement with their use of alcohol. Supervised one staff member. Maintained contact with numerous courts and probation officers. Provided community resources to clients and coordinated referrals as needed.

Instructor/Coordinator

Alcohol Services Center of Greater Springfield, Springfield, MA
1977-1980

Taught alcoholism awareness classes to individuals arrested for driving while intoxicated. Made recommendations to the court regarding case disposition. Provided individuals with resource information and coordinated referrals to counseling when needed.

Professional Membership/Offices Held

1981 - 1998 National Rehabilitation Counseling Association

Includes affiliation with National Rehabilitation Association

1981 - 1984 Massachusetts Rehabilitation Counseling Association

Includes affiliation with Massachusetts Rehabilitation Association; Treasurer, 1983 - 1984.

1984 - 1998 Virginia Rehabilitation Counseling Association

Includes affiliation with Virginia Rehabilitation Association

1986-Present

IARP (formerly NARPPS), CARPPS and Virginia NARPPS

National (Chesapeake and Virginia Chapters) Association of Rehabilitation Professionals in the Private Sector now known as the International Association of Rehabilitation Professionals. Secretary/Treasurer of Virginia NARPPS, 1988 - 1990; Secretary, 1990 - 1991; Treasurer, 1991 - 1993; President-Elect, 1993 - 1994; President, 1994 - 1995; Immediate Past President, 1995-1996; Northern Virginia Regional Representative 5/02 - 5/03. Annual Conference Chair, 1995 - 1996. Helped organize state annual conferences 1994 - 2000. Served on national NARPPS Board as Council of Chapter Presidents representative, 1994 - 1995; Region III Representative, 1995 - 1996. Worked with National NARPPS office as the Legislative Consultant, 5/96 - 12/96. Served as Co-Chair of the Forensic Section, 4/98 - 3/99 and again from 5/05 - 5/06. Chair, CEU Committee 5/03 - present. Chair, Student Volunteer Scholarship Program 2/05 - present.

1996 - Present

American Board of Disability Analysts

1998 - 2000 American Rehabilitation Economics Association

1999 - Present

American Board of Vocational Experts

7/05 - present - serving as peer reviewer for individuals seeking certification at various levels

Presentations

03/07	Medical Set-Aside Idaho State Bar
11/05	Vocational Expert Opinion in Employment Discrimination Cases IARP Forensic Section Conference
11/05	MSA Made Easy IARP Forensic Section Conference
10/05	The REAL World of MSA Preparation Medipro seminar - Advanced Medicare Set- Aside Program
03/01	Presented Seminar on Life Care Planning PHICO Insurance Company
12/95	Presented at Seminar on Return to Work INOVA Center for Rehabilitation

Professional Peer Review Certifications

Life Care Plan Work Product- International Association of Rehabilitation Professionals, 2000

Professional Peer Reviewer

Earnings Capacity Evaluation - International Association of Rehabilitation Professionals, 2000

Life Care Planning - International Association of Rehabilitation Professionals, 2000

Awards

Rehabilitation Professional of the Year 2000-2001 presented by Virginia NARPPS

(Updated 03/2007)

		Sworn Testimony
6/16/04	Wilson v Wilson	Trial testimony-divorce (Fairfax Co., VA)
6/21/04	Ricchini v McDonalds	Deposition-sexual harassment/personal injury (Montgomery Co., MD)
6/28/04	Harrison v Amtrak	Deposition-personal injury/WC (Wash, DC)
8/11/04	Persaud v Northstar	Trial testimony-sexual harassment/personal injury (Anne Arundel Co, MD)
9/24/04	Luellen v Luellen	Trial testimony-divorce (Fauquier Co., VA)
11/23/04	Wright v Magruders	Deposition-workers' compensation (VA)
12/7/04	Knopf v Knopf	Deposition-divorce (Montgomery Co, MD)
12/13/04	Kalkunte v DVI/AP	ALJ Hearing (Sarbanes/Oxley case-DOL)
12/20/04	Inge v Levine, et al.	Deposition-med mal (City of Danville, VA)
1/5/05	Buruca-Melgar v Prince George's Co	Deposition-personal injury (Prince Georges Co, MD)
1/13/05	Semere v Wyndham Washington	ALJ Hearing-workers' compensation (DC)
1/17/05	Helal v Radice	Deposition - atty malpractice
1/18/05	Walker v Wal-mart	Deposition-workers' comp (Charles Co,MD)
1/20/05	Walker v Wal-mart	Trial testimony - WC (Charles Co., MD)
2/7/05	Inge v Levine, et. al.	Trial testimony-medical malpractice (City of Danville, VA)
2/14/05	Farley v Wilbar & Arnold	Deposition – workers' compensation (VA)
3/2/05	Mejia v Prince George's Hospital Ctr	Deposition – wrongful birth (Prince Georges Co., MD)
3/8/05	Schwartz v Schwartz	Deposition - divorce (Fairfax Co, VA)
3/23/05	Beck v Beck	Trial testimony - divorce (Fairfax Co., VA)
3/28/05	Hall v Cohen	De Bene Esse Depo-personal injury (Conn)
4/12/05	Clark v Weinstein et al	Trial testimony-personal injury (DC Sup Ct)
5/16/05	Kantor v Grand Marquis Café	Trial testimony-workers' comp (MD)
5/23/05	Miller v U.S. Airways	Deposition – workers' compensation (VA)
5/24/05	Sharifi v Arlington Hospital	ALJ Hearing - workers' compensation (VA)
6/20/05	Miller v U. S. Airways	ALJ Hearing - workers' compensation (VA)
6/24/05	Devers v INOVA	ALJ Hearing - workers' compensation (VA)
6/27/05	Birdsall v UPS	Deposition – MVA
8/18/05	Continental Realty Corp v Charles Talar	Trial testimony-eviction (Baltimore Co,MD)
8/23/05	Tlapecchco v Handler Corp, et al.	Trial testimony – personal injury (New Castle Co, DE)
9/14/05	Nessa v Qureshi	Deposition-med mal (Bergen Co, NJ)
9/20/05	Weaver v Emergency Physicians	Deposition-med mal (Fairfax Co, VA)
9/28/05	Fadnes v Fadness	Trial testimony-divorce (Fairfax Co, VA)
11/28/05	Gripiotis v Gripiotis	Trial testimony-divorce (Mont Co, MD)
1/4/06	Gimbel v American Radiology	Deposition - wrongful birth (Baltimore City, MD)
1/5/06	Brown v PEPCO	Trial testimony – workers' comp (DC)
1/30/06	Henry v Verizon	Trial testimony - WC appeal (Prince George's County, MD)
1/30/06	Vieira v Vieira	Trial testimony – divorce (Prince William County, VA)
2/2/06	Bodnar v Erie Insurance Group	Deposition – MVA (St. Mary's Co., MD)
2/7/06	Brooks v WMATA/Baker Heavy Hwy	Trial testimony - workers' comp (DC)
3/1/06	Bin v Thomas R. Williams Construction	ALJ Hearing – workers' compensation (VA)
3/6/06	Rice v Haddock	Deposition – med mal (Anne Arundel Co., MD)
3/21/06	Yuen v Gubrud	Trial testimony – custody and child support (Prince William Co., VA)
4/3/06	Toder v Alternative Designs	ALJ Hearing – workers' compensation (VA)

4/24/06	Washington v Square D Co., et al.	Deposition – personal injury (City of Richmond, VA)
4/26/06	Clingerman v Holy Cross Hospital	Trial testimony – WC appeal (Prince George's County, MD)
5/1/06	Hebble v Otis Elevator	Deposition – personal injury (Arlington Co, VA)
5/1/06	Van Kirk v Van Kirk	Deposition – divorce (Fairfax Co., VA)
6/6/06	Butler v Progressive Nursing	Trial testimony – workers' comp (D.C.)
6/6/06	Smith v TSS	Trial testimony – employment discrim/ harassment (Prince George's Co., MD)
6/9/06	Fonseca Lugo v 16 th Street Clinic	Trial testimony- med mal (Federal Court, Milwaukee, WI)
6/26/06	Harrison v Harrison	Trial testimony–divorce (City of Alex, VA)
7/19/06	Headley v J. M. Benson Co	Trial testimony – workers' comp (D.C.)
7/20/06	Feord v Feord	Trial testimony-divorce (Fairfax Co., VA)
7/25/06	Weaver v Craig	Deposition – personal injury (Anne Arundel, Co., MD)
8/15/06	Porterfield v Porterfield	Trial testimony – divorce (Prince William, Co., VA)
9/6/06	Tlapecchco v Handler Corporation, et al.	Deposition – personal injury (New Castle Co., DE)
9/18/06	Coleman v Mitsubishi Caterpillar Forklift	Deposition – personal injury (City of Lynchburg, Lynchburg, VA)
9/27/06	Miazzia v Miazzia	Trial testimony-divorce (Fairfax Co., VA)
10/19/06	Monroe v Barton Protective Services	Deposition-workers' comp (D.C.)
11/16/06	Murry v BNA	Deposition-wrongful termination (D.C.)
11/21/06	Gripiotis v Gripiotis	Trial testimony-divorce (Mont Co., MD)
11/28/06	Aikman v Kanda	Trial testimony-med mal (Superior Court for the District of Columbia)
12/12/06	Muhammad v Eastern Electric	Trial testimony - workers' comp (DC)
12/19/06	Keller v Keller	Trial testimony - divorce (Fairfax Co., VA)
2/2/07	Elguezabal v UMMS	Deposition-med mal (Baltimore City Court)
3/5/07	Gross v Bank, M.D.	Deposition-med mal (Superior Court for the District of Columbia)
3/6/07	Boyd v Taylor-Boyd	Trial testimony - divorce (Fairfax Co., VA)
3/12/07	Shapiro v Shapiro	Trial testimony - divorce (Arlington, Co., VA)
3/13/07	McGhee v Popeye's	Trial testimony – worker's compensation appeal (Prince George's Co., MD)
4/11/07	Seroka v Seroka	Trial testimony – divorce (Fairfax Co., VA)
4/12/07	Kreutzberger/Lamberson v Wermuth	Deposition-med mal (Superior Court of NJ, Hunterdon County)
5/9/07	Casamento v UPS	Deposition–MVA (US District Court for the District of Maryland – Southern Division)
5/21/07	Decker v Ciacci, M.D., et al	Deposition-med mal (Baltimore City Court)
5/29/07	Joyce v Calvert Co. Board of Education	Trial testimony – workers' compensation appeal (Calvert Co., Maryland)
5/31/07	Sharps v District Hospital Partners	Deposition-med mal (Superior Court for the District of Columbia)
6/22/07	Zavala v WASA	Deposition – MVA (Superior Court for the District of Columbia)
6/26/07	Calderon v Horning Brothers	ALJ Hearing - workers' comp (DC)
6/26/07	Novitsky v Novitsky	Trial testimony - divorce (Fairfax Co., VA)
7/17/07	Balmford v P & W Excavating, et al.	Deposition – MVA (Washington Co., MD)
7/25/07	Liu v Thomasson	Trial testimony – divorce (Fairfax Co., VA)
7/30/07	Curry v Marlow	Deposition – MVA (Warren Co., VA)

8/10/07	Bach v Bach	Trial testimony – divorce (Stafford Co., VA)
9/5/07	Banks v Banks	Trial testimony – divorce (Fairfax Co., VA)
9/20/07	Duchene v Duchene	Deposition – divorce (Fairfax Co., VA)
9/24/07	Stemke v Honeywell	Trial/ALJ testimony – WC/Longshore
10/2/07	Betts v Berwind Corporation	Deposition – WC (Prince George's Co, MD)
10/4/07	Afshar v Marshall's	Deposition – personal injury (Prince George's Co., MD)
10/17/07	Balmsford v P & W Excavating, et al.	Trial testimony – MVA (Washington Co., MD)
10/30/07	Kelley v Kelley	Trial testimony – divorce (Mont. Co., MD)
11/7/07	Bado v Southland	Deposition – employee discrimination (Prince George's Co., MD)
11/27/07	Johnson v Queen	Deposition – lead paint (Sup Ct. for DC)
12/12/07	Monroe v Lockheed Martin	ALJ Hearing – workers' comp (DC)
12/19/07	Booth v UMMS	Deposition – med mal (Baltimore, MD)
1/9/08	Judeh v Kheder	Deposition – negligence (Fairfax Co., VA)
1/14/08	Francella v Poole & Kent	Deposition – workers' comp (VA)
1/23/08	Griffin v Griffin	Trial testimony – divorce (Winchester, VA)
2/6/08	Moshari v Enterprise Leasing	Deposition – workers' comp (VA)
3/18/08	Hall v DORS	ALJ Hearing – OHA (Baltimore, MD)
3/20/08	Wilson v GEICO	Deposition – employment discrimination (Montgomery Co., MD)
3/20/08	Easter v PEPCO	Trial testimony - workers' comp (Prince George's Co., MD)
03/25/08	Reed-Baden v Abidin, M.D.	Deposition – med mal (Fairfax Co., VA)
04/09/08	Wolff v Wolff	Trial testimony – divorce (Prince William Co., VA)
04/15/08	Zervas v Wasington Hospital Center	Deposition – med mal (Superior Ct of DC)
04/22/08	Morris v Keibler-Thompson	Deposition – personal injury (Baltimore Co., MD)
04/25/08	Morris v Keibler-Thompson	Trial testimony – personal injury (Baltimore County, Maryland)
04/29/08	Wharton v Centeno. et al.	Deposition – MVA/personal injury (Superior Court of the District of Col.)
6/1/08	Oliver v George Washington Univ.	ALJ Hearing – Workers' Comp (DC)
6/9/08	Trammell v Montgomery co Board of Ed.	Deposition – Workers' Comp (Maryland)
6/18/09	Jones-Whitley v Isabel Mercer, et al.	Deposition – MVA/persona injury (Superior Court of the District of Columbia)
6/19/08	Rekow v Rekow	Deposition-divorce (Rappahannock Co.,VA)
7/22/08	Richard Williams v Bob Hall, Inc	Deposition – Workers' Comp Appeal (Calvert Co., MD)
7/24/08	Richard Williams v Bob Hall, Inc	Trial testimony – Workers' Comp Appeal (Calvert Co., MD)
7/28/08	Robert Armstrong v Hamilton Group	ALJ Hearing – Workers' Comp (DC)
7/30/08	Ezzati v Ghiasi	Deposition – divorce (Montgomery Co., MD)
7/31/08	Wolff v Schwinn	Deposition – MVA/personal injury (Montgomery County, MD)
8/4/08	Bado v Southland	Deposition-Workers' comp (Maryland)

EXHIBIT B

Life Care Plan

Linda Muse-Freeman

**Prepared by: Trudy R. Koslow, M.Ed., CRC, CCM, CLCP, ABVE (D)
Vocational Rehabilitation Consultant and Life Care Planner**

**George Moore & Associates, Inc.
2046 John Rolfe Parkway
Richmond, VA 23238**



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I. Introduction

This Life Care Plan was completed at the request of Tess Kline, Esquire, from the law firm of Buckley & Thoreaux, LLC, of Princeton, New Jersey. The Life Care Plan is a dynamic document based upon a comprehensive assessment, data analysis and research, which provides an organized, concise plan for current and future needs, with associated costs for Ms. Linda Muse-Freeman.

The opinions contained in this report are held to within a reasonable degree of certainty in the field of life care planning. If further information regarding Ms. Muse-Freeman becomes available, this report is subject to change. The Life Care Plan was completed after review of the following documents and records:

1. Personnel Records of Ms. Linda Muse-Freeman
2. Medical Records of Armen Simonian, M.D.
3. Medical Records, Capital Health Systems
4. Medical Records, Manish Gugnani, M.D.
5. Medical Records, Satvinder Dhillon, M.D.
6. Records of Capital Health System Anesthesia Record
7. Partial Hospital Chart Capital Health System @ Mercer (Discharge Summary History and Physical)
8. Deposition of Dr. Deborah Fox
9. Records from Princeton Insurance Company
10. Answers to Interrogatories of Dr. Bhatti
11. Photographs of the Plaintiff
12. Preliminary Life Care Plan, Terri Patterson, RN & Jody Masterson, RN – 09/27/2007
13. Life Care Plan Addendum – 04/30/2008
14. Anesthesia Note of Client, 8/8/2005
15. Records and Rule 26 Disclosure of Co-Defendant Armen Simonian, MD and Mercer Gastroenterology
16. Medical Report, Steven Konstadt, MD – 07/01/2008
17. Medical Reports, James F. Noone, MD – 04/25/2008, 04/28/2008
18. Nursing Report, Paul J. Nissley, CRNA
19. Medical Report, David Morowitz, MD – 04/28/2008
20. Assessment of Economic Loss, Jerome M. Staller, Ph.D. – 02/14/2008
21. Physical Medicine and Rehabilitation Evaluation, Richard P. Bonfiglio, MD – 03/26/2008
22. Deposition, Selve Muse-Freeman – 05/02/2008
23. Deposition, Melissa Wilson – 05/02/2008
24. Medical Records, Williams Hirsch, M.D.
25. Deposition, Thania Camilo, RN – 04/08/2008
26. Deposition, Susan Pietrazak, RN – 04/08/2008
27. Records, J.C. Nationwide
28. Deposition, Imran Bhatti, MD – 03/17/2008
29. Deposition, Armen Simonian, MD – 02/15/2008

30. Deposition, Elinor Winter, CRNA – 02/29/2008
31. Personnel file, Linda MF, Capital Health System

In addition to reviewing the records, I had the opportunity to see Ms. Muse-Freeman in the nursing facility in which she currently resides. Ms. Muse-Freeman has been diagnosed with MRSA. Therefore, a gown and surgical mask had to be worn when entering Ms. Muse-Freeman's room. Mr. Tom Donnelly, Ms. Muse-Freeman's attorney and Stacy Hohenleitner, a registered nurse attended the meeting. While at the nursing facility, I had the opportunity to speak with several individuals who work at the nursing facility including Dianne Walker and Mary Clayton, two nurses on the floor on which Ms. Muse-Freeman resides and Carl, one of the employees in the bookkeeping department.

II. Personal Information

Ms. Muse-Freeman is a 57 year old female. (DOB – 3/13/1950). She currently resides in Briarleaf Nursing Facility in Doylestown, Pennsylvania. She has two adult daughters who visit regularly.

III. Medical Summary

On August 8, 2005, Ms. Muse-Freeman underwent a medical procedure for a gallbladder problem. This procedure required administration of anesthesia. She was administered the anesthesia, per the pre-operative evaluation. A code was called on Ms. Muse-Freeman and she was transferred to the Intensive Care Unit (ICU). She had an episode of bradycardia and was intubated and chest compression was started. After being transferred to the ICU, she was on a ventilator.

Ms. Muse-Freeman was admitted to Briarleaf Nursing Home in April 2007. Her treating physician since she has been at this facility is Dr. Deborah Fox. According to Dr. Fox, Ms. Muse-Freeman "is in a persistent vegetative state and unable to do anything for herself and must have continuous nursing care. She is fed through a PEG tub as she is unable to eat. She has a trach. She has wounds which require nursing care. She is unable to bathe or dress herself and she is verbally uncommunicative." Ms. Muse-Freeman is dependent on others for all of her daily living activities and medical care.

Prior to coming to Briarleaf, Ms. Muse-Freeman she was at Langhorne Garden for approximately one year.

While at Briarleaf, Ms. Muse-Freeman has been admitted to the local hospital on occasion for respiratory infections. After each hospital admission, she returns to Briarleaf.

IV. Current Medical Treatment

Currently, Ms. Muse-Freeman requires 24/7 care, 365 days per year. That care is being provided in a nursing home facility where trained professionals and support staff take care of her activities of daily living, administer medication, and provide medical care. There is a doctor available for medical emergencies and routine medical care.

Ms. Muse-Freeman sees Dr. Fox, her primary care physician, once a month. In addition, she sees a pulmonologist regularly, a podiatrist every three months and Dr. Steinberg, a wound care specialist, every week. Ms. Muse-Freeman currently has several sores that are being monitored by the physician on a weekly basis. Dr. Steinberg's note of June 24, 2008 indicates that the "wounds overall are stable or improved".

V. Medications

Ms. Muse-Freeman is on numerous medications. A list of her current medications was provided by the facility in which she currently is residing. I have not included the medications for high blood pressure (Catapres, Enalapril, Metoprolol/Lopressor, and Amlodipine) or diabetes in the Life Care Plan. Ms. Muse-Freeman had diabetes and high blood pressure prior to August 2005.

VI. Functional Abilities

Ms. Muse-Freeman is unable to respond in any manner to any question. Cognition, perception, and pain are unable to be accurately accessed.

Ms. Muse-Freeman is not ambulatory. She remains in her bed most of the week. She is placed in a geri-chair/reclining wheelchair a couple times a week. She is unable to sit in a regular wheelchair since she has no balance and is unable to assist in her own activities.

Ms. Muse-Freeman is fed and provided medications via a tube. She is unable to eat any food. She is unable to swallow medications.

Ms. Muse-Freeman is incontinent. She wears adult diapers and is changed during the day. She is not catheterized. Ms. Muse-Freeman has a colostomy for bowel functions.

In meeting with Ms. Muse-Freeman, it was noted that she was unable to perform any activities upon request. She was able to open her eyes to noise; however, she did not turn her head in the direction of the person speaking when asked, and she was unable to respond in any manner to any question. She does not blink, nod, move her eyes or move her fingers (can not squeeze a hand) in response to questions.

VII. Recommendations

As previously noted, Ms. Muse-Freeman currently resides in a nursing facility. Ms. Muse-Freeman is involved in restorative nursing, which includes basic range of motion exercises. Other activities that are covered by the facility include washing, dressing, incontinence care, turning every few hours to avoid additional bed sores, checking skin integrity, wound care of the existing sores, feeding via a G-tube, tracheostomy care, suctioning as needed, medication management, and placing splints on Ms. Muse-Freeman's hand to avoid contractures. No additional therapies, such as physical therapy or speech therapy have been recommended. Also as previously noted, there is no method of communicating with Ms. Muse-Freeman since she does not respond in any manner and her cognition can not be assessed. Therefore, speech/cognitive therapy would not be of any benefit.

In the Life Care Plan, a daily charge in the nursing facility includes the per diem rate (which includes the restorative nursing program - \$249.00), partial concentrator use/oxygen (\$8.00/day), specialty mattress use (\$55.00/day), disposable medical supplies such as gauze, tape, etc for wound care (\$10.00/day), and full incontinence care (\$10.00/day). There also is \$32.00 fee per month for laundry services.

The facility also provides all necessary equipment that is necessary such as wheelchairs, a Hoyer lift, etc, and are available at no extra cost.

Facility Care: Ms. Muse-Freeman is residing at Briarleaf Nursing Facility. She requires specialized care that she would not be provided at home. In addition, although it has not been possible to assess her perception or cognition, the nursing facility provides constant stimulus that Ms. Muse-Freeman would not obtain at home. The facility cost is included in the life care plan as outlined above.

Routine Medical Care: Medical/physician care is not covered by the facility fee. Ms. Muse-Freeman has four physicians that are participating in her care, a primary care physician, a pulmonologist, a podiatrist and a wound specialist.

Medications: Medications also are an additional cost, and have been included in the life care plan. Medications for high blood pressure have not been included in the plan.

Diagnostic Testing: Ms. Muse-Freeman will need some periodic diagnostic testing to evaluate her condition.

Orthotics/Splints: Ms. Muse-Freeman wears splints on her hands each day.

Hospitalizations: Ms. Muse-Freeman has experienced several hospitalizations as a result of various respiratory problems. She is generally taken to the Emergency Department and then hospitalized for a few days. She does not have just Emergency Room visits. Her last admission was for a respiratory infection/pneumonia and an upper

gastrointestinal bleed and was from May 7, 2008 to May 15, 2008. She has not been hospitalized since that time.

Transportation: Ambulance rides to the hospital are an extra charge.

Thank you for the opportunity to evaluate Ms. Muse-Freeman. If you have any further questions or concerns, please feel free to contact me at any time.

Respectfully submitted by,



Trudy R. Koslow, M.Ed., CRC, CCM, CLCP, (D)ABVE
Vocational Rehabilitation Consultant and Life Care Planner

George Moore & Associates, Inc.
2046 John Rolfe Parkway
Richmond, Virginia 23238

LIFE CARE PLAN

Client Name: Linda Muse-Freeman
Date of Birth: March 13, 1950
Facility Care
Date Prepared: July 10, 2008

Type	Age/Year Initiated	Age/Year Suspended	Frequency	Base Cost	Annual Cost
Briarleaf/Facility Care	2008	Lifetime	Daily 24/7	\$332.00 per day*	\$121,564.00

*Cost includes per diem (\$249.00), mattress (\$55.00 per day), disposable medical supplies (\$10.00 per day), fall incontinence care (\$10.00 per day), partial concentrator/ oxygen care (\$38.00 per day) and includes \$32.00 per month for laundry services.

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Richmond, Virginia 23238

LIFE CARE PLAN

Client Name: Linda Muse-Freeman
Date of Birth: March 13, 1950

Date Prepared: July 10, 2008

Routine Medical Care

Type	Age/Year Purchased	Age/Year Suspended	Frequency	Base Cost	Annual Cost
Primary Care Physician	2008	Lifetime	12 times a year	\$100-150.00	\$1,200-1,800.00
Podiatrist	2008	Lifetime	4 times a year	\$100-150.00	\$400-600.00
Pulmonologist	2008	Lifetime	4 times a year	\$200-250.00	\$800-1,000.00
Wound Care Specialist	2008	Lifetime	52 times a year	\$150-200.00	\$7,800-10,400.00

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LIFE CARE PLAN

Client Name: Linda Muse Freeman
Date of Birth: March 13, 1950

Date Prepared: July 10, 2008

Medications

Description/Item	Age/Year Purchased	Age/Year Suspended	Replacement Schedule	Base Cost	Annual Cost
Keppra 5 ml per day	2008	Lifetime	5 ml per day	\$911.14 for 1400 ml	\$1,187.73
Zolpidem 10 mg/Ambien	2008	Lifetime	1 per day	\$45.97 for 90	\$186.43
Tramadol HCl 50 mg / Ultram	2008	Lifetime	2 per day	\$47.97 for 90	\$389.09
Lactinex 1 gm	2008	Lifetime	3 per day	\$36.97 for 36	\$1,124.50
Albuterol / Duoneb	2008	Lifetime	3 per day	\$383.24 for 180	\$2,331.38
Reglan / Metoclopram	2008	Lifetime	60 ml per day	\$21.98 for 480 ml	\$1,002.84
Prevacid	2008	Lifetime	30 mg once a day	\$355.96 for 90	\$1,443.62
Ferrous Sulfate	2008	Lifetime	15 ml per day	\$16.93 for 946 ml	\$97.98
Colace	2008	Lifetime	One per day	\$20.99 for 60	\$127.69
Mucomyst - 10	2008	Lifetime	15-18 ml per day	\$103.93 for 180 ml	\$3,161.20

George Moore & Associates, Inc.
2046 John Rolfe Parkway
Richmond, Virginia 23238

LIFE CARE PLAN

Client Name: Linda Muse-Freeman

Date of Birth: March 13, 1950

Date Prepared: July 10, 2008

Diagnostic Testing

Description	Age/Year Initiated	Age/Year Suspended	Frequency	Base Cost	Annual Cost
Bloodwork	2008	Lifetime	12 times a year	\$125.00	\$1,500.00
Chest X-rays	2008	Lifetime	1 time a year	\$500.00	\$500.00

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LIFE CARE PLAN

Client Name: Linda Muse-Freeman

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Supplies

Item	Age/Year Purchased	Age/Year Suspended	Replacement Schedule	Base Cost	Annual Cost
Splints	2008	Lifetime	Once a year	\$500.00	\$500.00

LIFE CARE PLAN

CHART E

George Moore & Associates, Inc.
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LIFE CARE PLAN

Client Name: Linda Muse-Freeman

Date of Birth: March 13, 1950

Date Prepared: July 10, 2008

Hospitalizations

Description	Age/Year Initiated	Age/Year Suspended	Frequency	Base Cost	Annual Cost
Hospitalizations	2008	Lifetime	3-4 times a year 5-7 days each	\$3,000-4,000.00	\$45,000-112,000.00

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LIFE CARE PLAN

Client Name: Linda Muse-Freeman

Date of Birth: March 13, 1950

Date Prepared: July 10, 2008

Transportation

Type	Age/Year Purchased	Age/Year Suspended	Replacement Schedule	Base Cost	Annual Cost
Ambulance Service	2008	Lifetime	3-4 times a year	\$400.00	\$1,200-1,600.00

EXHIBIT C

1 TRUDY R. KOSLOW, M.Ed.

2 Medicare is only a secondary
3 provider, not a primary provider. That
4 workers' comp people should still be the
5 primary provider.

6 So when you settle your case,
7 you have to set aside enough money to cover
8 future medical that Medicare would potentially
9 cover. And -- and to do that, that actually
10 has to be evaluated by Centers for Medicare and
11 Medicaid Services, to make sure that that's
12 adequate for the coverage that you're going to
13 need in the future.

14 Q. So you would look at -- on
15 behalf of Medicare and Medicaid, you would look
16 at the patient's needs, their future needs, and
17 look at whatever monetary fund the attorneys
18 were willing to set aside in a settlement and
19 decide if that was sufficient from Medicare and
20 Medicaid's perspective?

21 A. That's what I'm doing now,
22 correct.

23 Q. Okay. You are not an R.N.; is
24 that correct?

25 A. Correct.

1 TRUDY R. KOSLOW, M.Ed.

2 Q. And are you -- as a
3 rehabilitation counselor, do you believe you
4 have sufficient expertise to render medical
5 advice or provide medical advice?

6 A. I don't know what you mean by,
7 "medical advice." I can certainly do some
8 things medically-related, yes.

9 Q. Are you qualified to render or
10 give medical treatment?

11 A. No.

12 Q. Or make medical diagnoses?

13 A. No.

14 Q. And -- or make recommendations
15 as to what tests may be required for a patient
16 for diagnostic purposes?

17 A. Yes.

18 Q. Can you order medical tests?

19 A. No.

20 Q. Have you reviewed cases before
21 for Buckley & Theroux?

22 A. Yes.

23 Q. Can you give me an idea how
24 many?

25 A. A handful. Five, maybe, six.

1 TRUDY R. KOSLOW, M.Ed.

2 Ms. Kline?

3 A. I don't know. I don't know.

4 Q. Have you ever offered an
5 opinion, either in a report or in testimony, as
6 to what a patient with a brain injury, what
7 their life expectancy is?

8 A. No.

9 Q. Is that an area that you believe
10 you're qualified to render an opinion on?

11 A. No.

12 Q. The evaluation or the time you
13 spent with Mrs. Muse at the nursing home, was
14 that a medical evaluation? Clinical
15 evaluation?

16 A. I'm not a doctor. So it was a
17 life care planning evaluation.

18 Q. Let me just look real quickly at
19 your list of testimony.

20 Can you give me an estimate as
21 to how much, on an annual basis, you earn from
22 your expert reviews and testimony?

23 A. I have no idea.

24 Q. What is your hourly rate for
25 today?

1 TRUDY R. KOSLOW, M.Ed.

2 BY MS. SHELLY:

3 Q. Can you read -- the first page
4 is dated July 1st, 2008; is that right?

5 A. Yes.

6 Q. Okay. The top left-hand side is
7 very difficult to read on the copy. So just
8 read what is written on the top left-hand side.

9 A. It says, "Seizures. Last
10 hospitalization. Last ER visit. Bedsores.
11 Meds. Docs. PT, OT, ST. Facility cost. What
12 per diem includes. What's extra. What
13 equipment used. What equipment covered."

14 Q. Okay. What -- do you recall why
15 you wrote these notes?

16 A. These were some things I wrote
17 prior to going there to make sure that I looked
18 at or asked about.

19 Q. And did -- were these notes
20 based on conversations you had with anybody
21 involved in this case?

22 A. No.

23 Q. Were they generated because you
24 had reviewed medical records?

25 A. They were generated because I

1 TRUDY R. KOSLOW, M.Ed.

2 was thinking about going there.

3 Q. Okay. Had you reviewed the
4 medical records before you went to see her?

5 A. Some of them. Not all of them.

6 Q. On the second page, you list --
7 it looks as though you're listing supplies in
8 the room?

9 A. Yep.

10 Q. And the supplies listed here,
11 can we agree that she needs those?

12 A. Yes.

13 Q. About two-thirds of the way down
14 the page, it's written -- I think it says,
15 "Total care"?

16 A. Yes.

17 Q. What does that mean?

18 A. That she is total care.

19 Q. She needs total care?

20 A. That she cannot care for herself
21 at all.

22 Q. And can we agree -- would you
23 agree with the statement that she needs total
24 care because of her anoxic brain injury?

25 MS. KLINE: Objection to form.